

Message

From: Ichinotsubo, Lene K [lene.ichinotsubo@doh.hawaii.gov]
Sent: 7/30/2021 5:45:11 PM
To: Tu, Lyndsey [Tu.Lyndsey@epa.gov]; Matt Tonkin [matt@sspa.com]; Carvalho, Gabriela [Carvalho.gabriela@epa.gov]; Palazzolo, Nicole [Palazzolo.Nicole@epa.gov]
CC: Grange, Gabrielle Fenix [gabrielle.grange@doh.hawaii.gov]; roxanne.kwan@doh.hawaii.gov; Whittier, Robert [Robert.Whittier@doh.hawaii.gov]; Shende, Anay [anay.shende@doh.hawaii.gov]; Donald Thomas [dthomas@soest.hawaii.edu]; g.d.beckett@aquiver.com
Subject: FW: [EXTERNAL] Reviews by Matt T.
Attachments: 1721 - SSPA Memo - Geochemistry of IRR - 9-21-2020.docx; NavyFilesMemo.docx

Thanks for the response. Forwarding to DOH's team.

From: Tu, Lyndsey <Tu.Lyndsey@epa.gov>
Sent: Friday, July 30, 2021 7:36 AM
To: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; Matt Tonkin <matt@sspa.com>
Cc: Grange, Gabrielle Fenix <Gabrielle.Grange@doh.hawaii.gov>; Palazzolo, Nicole <Palazzolo.Nicole@epa.gov>
Subject: RE: [EXTERNAL] Reviews by Matt T.

Hello Lene,

Thanks for reaching out about this, I am pulling Matt into the loop so we're all on the same page. Regarding memos, there is a groundwater flow model memo which was shared with HDOH with our initial draft of the response letter, if you need a copy send again please let me know. We discussed with Matt potentially updating this memo to include the additional hypothesis testing work completed in collaboration with HDOH. I do not believe Matt has revised the memo but he can clarify if he has. This would be with content that HDOH SME's are very familiar with at this point.

There is a review of the IRR document from 2020, this was by Matt's staff at SSP&A, the review was formalized into a memo but I am we never finalized it. You will note the Memo is marked draft and still has some unaddressed comments included. We generally have not shared draft memos, but I realize that hearing there was an unshared memo may have seemed concerning from your perspective. We have not been working on the IRR at EPA and have simply not had the capacity to make reviewing this memo or the IRR a priority as we are heavily involved in the groundwater flow model deliverable at this time.

Presently Matt is developing a memo to go with the model files which we are sharing externally. This draft was received yesterday, and is being reviewed and commented on for clarity by EPA. Though this is not a memo reviewing the Navy's work I am sharing this for the sake of transparency. There are NO additional memos.

I do have some concerns about your last statement, the SME team being in technical alignment on potential approaches does not equate to the regulatory agencies agreement on a path forward or schedule for these sections. I believe it may be in all of our best interest to continue the discussion on the GWFM letter and path forward between the EPA/HDOH project management team in the near future, to me this is the only way to ensure a coordinated response by the agencies.

Thanks,

Lyndsey Tu
Underground Storage Tanks Program
Land Division, U.S. EPA Pacific Southwest
Tu.Lyndsey@epa.gov | 415-972-3269

From: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>
Sent: Wednesday, July 28, 2021 12:44 PM
To: Tu, Lyndsey <Tu.Lyndsey@epa.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>
Cc: Grange, Gabrielle Fenix <gabrielle.grange@doh.hawaii.gov>
Subject: FW: [EXTERNAL] Reviews by Matt T.

Hi Lyndsey and Gabriela,

I recognize that we have not received EPA's comments on the draft GWFM and IRR letters, however, we are looking to revise those letters to hopefully bring them in closer alignment given recent discussions. To help us revise the draft letters, we are requesting copies of Matt's memos to EPA on his review of Navy's work. From our SME's discussion with Matt, we understand he provided memos to EPA on his concerns, including those relating to IRR, and other matters. In this push to break through to the key elements of g.w. protection, we benefit by knowing where the technical opinions stand. Our sense is there is alignment of our regulatory SME team, and would like to reiterate some of these specific technical positions. Doing so may allow more efficient and coordinated responses by the agencies. I hope you agree.

Thanks,

Lene Ichinotsubo
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